

EXHIBIT A

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June 29, 2005

VIA FACSIMILE

Robert Proulx, Esq.
170 High Street
Suite 301
Taunton, MA 02780

Re: **The Estate of John Horton v. Dartmouth House of Correction, et al.**
U.S.D.C. No. 04-12058-WGY


Dear Mr. Proulx:

I am working on the above-captioned case along with Elizabeth Rennard. Pursuant to Local Rule 7.1(A)(2), this is a formal request to confer with you about your overdue discovery, namely your answers to Prison Health Services' First Set of Interrogatories and Request for the Production of Documents which were served upon you on February 2, 2005.

Your answers to the Interrogatories were due on April 26, 2005 and your response to the Request for Production of Documents was due on April 11, 2005. As of this date, we have not received any response from you. With that in mind, please contact me at the address listed above to discuss your overdue discovery and let me know when I can expect your answers. As I am sure you are aware, discovery in this matter ends on September 15, 2005. Therefore, if I do not hear from you by July 6, 2005, I will be forced to take further action up to and including a motion to compel the documents.

Your prompt response to this letter will be appreciated

Very truly yours,


Mary Eiro-Bartevyan

cc: Regina Ryan, Esq.

1330 Beacon Street, Suite 311, Brookline, Massachusetts 02446
617.738-7880
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 *** ACTIVITY REPORT ***

ST. TIME	CONNECTION TEL	CONNECTION ID	NO.	MODE	PGS.	RESULT
*06/24 14:38	978 887 2361	JOHN D KEENAN	6260	AUTO FAX RX ECM	3	NG 01'13 3 ##791
*06/24 14:40	978 887 2361		6261	AUTO FAX RX ECM	3	OK 00'57
*06/24 15:58	16177688915		0604	TRANSMIT ECM	12	OK 03'42
*06/24 17:26	6177398909		6262	AUTO FAX RX ECM	3	OK 01'12
*06/25 02:07			6263	AUTO FAX RX ECM	1	OK 00'33
*06/27 06:32			6264	AUTO FAX RX ECM	1	OK 01'18
*06/27 06:49	9787400072		6265	AUTO FAX RX ECM	1	OK 00'29
*06/27 10:35	17815959200		6266	AUTO FAX RX G3	2	OK 01'58
*06/27 10:42			6267	AUTO FAX RX ECM	1	OK 00'40
*06/27 10:55	17812393326		0605	TRANSMIT ECM	3	OK 00'57
*06/27 11:12			6268	AUTO FAX RX ECM	1	OK 00'37
*06/27 11:51	17815920115		6269	AUTO FAX RX ECM	5	OK 01'52
*06/27 14:42	11		6270	AUTO FAX RX ECM	3	OK 01'04
*06/27 15:11	9787459557		0606	TRANSMIT ECM	9	OK 03'05
*06/27 15:20	978 887 2361		6271	AUTO FAX RX ECM	3	OK 01'18
*06/27 15:50			6272	AUTO FAX RX ECM	1	OK 00'33
*06/27 16:04	19788872361		0607	TRANSMIT ECM	2	OK 01'05
*06/27 16:06	19788872361		0608	TRANSMIT ECM	2	OK 00'57
*06/27 17:07	17815995473		0609	TRANSMIT ECM	2	OK 00'52
*06/27 17:09	17812894485		0610	TRANSMIT ECM	2	OK 00'56
*06/27 17:12	14013315886		0611	TRANSMIT ECM	2	OK 00'46
*06/28 02:48			6273	AUTO FAX RX G3	1	OK 00'45
*06/28 08:46	17815920115		6274	AUTO FAX RX ECM	2	OK 00'41
*06/28 09:50	314 919 8891		6275	AUTO FAX RX ECM	6	OK 01'54
*06/28 11:25			6276	AUTO FAX RX ECM	1	OK 00'40
*06/28 13:00	978 744 7660		6277	AUTO FAX RX ECM	1	OK 00'35
*06/28 13:07	16104462804		0612	TRANSMIT ECM	20	OK 07'28
*06/28 13:17	978 744 7660		6278	AUTO FAX RX ECM	3	OK 01'14
*06/28 14:11			6279	AUTO FAX RX ECM	5	OK 01'34
*06/28 16:08			6280	AUTO FAX RX ECM	2	OK 01'16
*06/28 16:21	978 524 6061		6281	AUTO FAX RX ECM	3	OK 01'01
*06/29 07:17	781 268 2409		6282	AUTO FAX RX ECM	3	OK 00'51
*06/29 08:24	16172620046		0613	TRANSMIT ECM	1	NG 00'35 2 STOP
*06/29 08:27	16172620046		0614	TRANSMIT ECM	23	OK 08'54
*06/29 08:47	17134618130		0615	TRANSMIT ECM	3	OK 01'02
*06/29 08:52	13149199350		0616	TRANSMIT	0	NG 00'00 0 STOP
*06/29 08:53	13149198891		0617	TRANSMIT ECM	3	OK 01'00
06/29 10:21			6283	AUTO FAX RX ECM	1	OK 00'41
06/29 10:57	15088236443		0618	TRANSMIT ECM	2	OK 00'46
06/29 10:59	16174390325		0619	TRANSMIT ECM	2	OK 00'45